



# EXHIBIT A

**INDEX OF PLEADINGS FILED IN CASE NO. 1616-CV29724**  
**[THE STATE COURT PLEADINGS]**

<b>Ex. No.</b>	<b>Date</b>	<b>Description</b>
A-1	01/20/2017	Docket Sheet
A-2	12/14/2016	Petition for Damages
A-3	12/14/2016	Affidavit for Service by Certified Mail
A-4	12/20/2016	Summons - KSHB-TV
A-5	12/20/2016	Summons - Scripps Media
A-6	12/20/2016	Notice of Case Management Conference for Civil Case and Order for Mediation

# EXHIBIT A-1

	<h1 style="margin: 0;">Your Missouri Courts</h1>	<div style="display: flex; align-items: center;">  <div>             Search for Cases by: <span style="border: 1px solid black; padding: 2px;">Select Search Method...</span> </div> </div>
<div style="display: flex; justify-content: space-between; padding: 5px;"> <span>Judicial Links   eFiling   Help   Contact Us   Print</span> <span>GrantedPublicAccess Logoff CADUVALL11</span> </div>		
<b>1616-CV29724 - LISA BENSON COOPER V KSHB-TV ET AL (E-CASE)</b>		
Case Header	Parties & Attorneys	Docket Entries
Charges, Judgments & Sentences	Service Information	Filings Due
Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution

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All Entries

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☐ Ascending

<b>12/20/2016</b>	<input type="checkbox"/> <a href="#">Summons Issued-Reg/Cert Mail</a> Document ID: 16-SMCM-270, for SCRIPPS MEDIA.
	<input type="checkbox"/> <a href="#">Summons Issued-Reg/Cert Mail</a> Document ID: 16-SMCM-269, for KSHB-TV.
	<input type="checkbox"/> <a href="#">Case Mgmt Conf Scheduled</a> <b>Scheduled For:</b> 04/03/2017; 9:00 AM ; JOEL P FAHNESTOCK; Jackson - Kansas City
<b>12/14/2016</b>	<input type="checkbox"/> <b>Request for Jury Trial Filed</b>
	<input type="checkbox"/> <b>Judge Assigned</b>
	<input type="checkbox"/> <b>Filing Info Sheet eFiling</b> <b>Filed By:</b> DENNIS EDWARD EGAN
	<input type="checkbox"/> <b>Note to Clerk eFiling</b> <b>Filed By:</b> DENNIS EDWARD EGAN
	<input type="checkbox"/> <a href="#">Affidavit for Service by Mail</a> Affidavit for Service by Certified Mail to 2 Defendants. <b>Filed By:</b> DENNIS EDWARD EGAN
	<input type="checkbox"/> <a href="#">Pet Filed in Circuit Ct</a> Petition. <b>On Behalf Of:</b> LISA BENSON COOPER

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Released 01/19/2017

# EXHIBIT A-2

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**LISA BENSON COOPER,**  
**6026 Euclid Avenue**  
**Kansas City, MO 64130**

**Plaintiff,**

**v.**

**KSHB-TV,**  
**4720 Oak Street**  
**Kansas City, MO 64112**

**SERVE: Under Rule 54.13(b)(3)**  
**President and General Manager**  
**Brian Bracco**  
**4720 Oak Street**  
**Kansas City, MO 64112**

**and**

**SCRIPPS MEDIA, INC.**  
**312 Walnut Street, Suite 2800**  
**Cincinnati, OH 45202**

**SERVE:**  
**CSC-Lawyers Incorporating**  
**Service Company**  
**221 Bolivar Street**  
**Jefferson City, MO 65101**

**Defendants.**

**Case No.:**

**DEMAND FOR JURY TRIAL**

**PETITION FOR DAMAGES**

COMES NOW Plaintiff Lisa Benson Cooper, and for her causes of action against all  
defendant(s) alleges and avers as follows:

**PARTIES, GENERAL ALLEGATIONS, JURISDICTION AND VENUE**

1. Plaintiff Lisa Benson Cooper (hereinafter “Plaintiff”) is an individual currently residing in Kansas City, Missouri. At all relevant times she was employed by KSHB-TV, Channel 41.

2. Defendant KSHB-TV, Channel 41, has at all relevant times been a citizen of Missouri. Its exclusive and principal place of business has at all relevant times been in Jackson County, Missouri. Its exclusive and principal place of business now is 4720 Oak Street, Kansas City, MO 64112. KSHB-TV, Channel 41 may be served under Rule 54.13(b)(3) by leaving a copy of the Summons and Petition with the person in charge of the office at 4720 Oak Street, Kansas City, MO 64112. KSHB-TV is the registered legal name for plaintiff’s employer, and a copy of the pertinent document for KSHB-TV, Charter Number X01030338, “State of Business: MO.” is attached as Exhibit “A” and incorporated by reference.

3. Defendant SCRIPPS MEDIA, INC., is a corporation organized and existing under the laws of the State of Ohio, which has been, at all times relevant to the lawsuit, the controlling entity of Kansas City television station KSHB-TV, Channel 41. Scripps does business in Missouri – and for purposes of the transactions, conduct and occurrences raised herein, its sole and principal place of business in Missouri is 4720 Oak Street, Kansas City, MO 64112, Jackson County, Missouri, thus rendering Scripps Media, Inc., a citizen of Missouri. Scripps may be served by and through its Registered Agent, CSC-Lawyers incorporating Service Company, 221 Bolivar Street, Jefferson City, MO 65101. This defendant, at all times pertinent to this action, has operated and done business through its affiliated defendant, KSHB-TV, Channel 41, always in the state of Missouri.

4. Defendants, at all times relevant hereto, constitute “an employer” within the meaning of the Missouri Human Rights Act (“MHRA”), §213.010, et seq., RSMo.

5. Defendants employ (and at all times relevant hereto have employed) far in excess of six (6) employees, so as to come within the coverage of the MHRA, §213.010, et seq., RSMo.

6. Both jurisdiction and venue are proper in this Court. This Court has original subject matter jurisdiction over all of plaintiff’s Missouri state causes of action. KSHB-TV, Channel 41 is located exclusively in Jackson County, Missouri, and its sole and principal place of business is at 4720 Oak Street, Kansas City, MO 64112. All of the unlawful employment practices were committed in Missouri.

7. This Court has jurisdiction over plaintiff’s discrimination claims arising out of Missouri law, pursuant to §213.010, et seq., specifically §213.111, RSMo.

8. Plaintiff seeks damages in excess of this Court’s jurisdictional minimum of \$25,000.

9. On June 1, 2015, plaintiff filed her first Charge of Discrimination alleging race discrimination, retaliation and hostile work environment. On September 21, 2015, plaintiff filed a second Charge of Discrimination alleging further retaliation. Plaintiff’s Charges of Discrimination Number(s) E-06/15-45311 and E-09/15-45795 are attached hereto collectively as Exhibit “B,” and incorporated herein by reference.

10. On September 20, 2016, the MCHR issued plaintiff her Notice of Right to Sue for Missouri Charge Number E-06/15-45311. On December 13, 2016, the MCHR issued plaintiff her second Notice of Right to Sue for Missouri Charge Number E-09/15-45795. They are attached hereto collectively as Exhibit “C,” and incorporated by reference.



11. This action has been timely commenced by the filing of the Petition within ninety (90) days after the date written on the Notice of Right to Sue. Therefore, plaintiff has duly and completely met all administrative requirements of the MHRA.

**COUNT 1**  
**RACE DISCRIMINATION, RETALIATION AND HOSTILE**  
**WORK ENVIRONMENT IN VIOLATION OF MHRA**

12. Plaintiff began her employment with KSHB-TV on March 8, 2004, as a general assignment reporter. She currently holds the same title.

13. Throughout her tenure with KSHB-TV, plaintiff has applied for numerous promotions and has yet to receive one. The positions are consistently rewarded to white employees with far less experience than plaintiff.

14. In 2010, Plaintiff complained that she was consistently being sent to the urban core for all of her stories. Shortly after the complaint, she was asked to go to a KKK member's house alone. This is further evidence that plaintiff's race is constantly used in deciding where, or on what topics, she would be reporting.

15. While on maternity leave in 2013, Caucasian female Carrie Hoffman was hired as the news director. Shortly after that, Najahe Sherman's contract was not renewed. While still on maternity leave, plaintiff expressed interest in the open position. Upon her return in May 2013, plaintiff learned that the position was given to Lindsay Shively, a white female with far less experience.

16. In August 2013, plaintiff was offered a 2-year reporter contract. During this time frame, plaintiff was repeatedly sent out to the urban core for all of her assignments. Plaintiff complained that she was only being sent to the urban core of the city. The response to her

complaint was, “....well that is what you are used to,” obviously meaning because of her race, African American.

17. In 2014, plaintiff applied to be a “Leadership Champion” at the station to help the newsroom’s less experienced journalists and improve her own career. Plaintiff did not receive the position. Instead, it was given to a white male and a white female. Five months later, the “Leadership Champion” position became available again. The position was again awarded to a white male. No objective rationale exists for these choices.

18. In January of 2015, plaintiff applied to be a Consumer Reporter, Investigative Reporter and a Weekend Morning Anchor. Plaintiff was not considered for any of the positions. In fact, they were all filled by two white males and one white female. No legitimate, non-discriminatory rationale exists for this choice.

19. In April 2015, a white female with less experience than plaintiff was hired as a consumer reporter. Additionally, KSHB expanded the weekend newscasts affecting plaintiff’s schedule. Plaintiff presented a proposal to Carrie Hoffman, News Director, to work only on weekdays rather than continuing on the weekend. Later in a meeting, in front of the executive producer and HR manager, Ms. Hofmann informed plaintiff that she was an “inconsistent, unbalanced reporter” who is “not good enough” to work the Monday through Friday dayside shift. This was the first time plaintiff had been informed of any performance issues. In fact and to the contrary, all of plaintiff’s performance evaluations had been “meets expectations.”

20. On May 19, 2015, plaintiff met with Melissa Greenstein, Assistant News Director, in the newsroom for a scheduled feedback session. In the meeting, Ms. Greenstein questioned plaintiff’s decision to use file video for a flooding story. Plaintiff explained her reasoning and reiterated that if Ms. Greenstein ever had a specific video request she would honor

the request. At that point, Ms. Greenstein became extremely agitated and said, “You are not listening.” She then gathered her things and abruptly left the meeting. Later that same day, plaintiff received an email from Ms. Greenstein (falsely) stating that plaintiff was not receptive and combative during the feedback session.

21. On May 21, 2015, plaintiff received a telephone call from Jessica Eggers, KSHB-TV Human Resources Director. Ms. Eggers wanted to schedule a meeting for May 22, 2015.

22. On May 23, 2015, Plaintiff called the Ethicpoint Line to report ongoing differential treatment, racial discrimination and a hostile work environment connected to Plaintiff’s race. Plaintiff feared retaliatory actions would take place during the upcoming meeting. Her fears came true.

23. Plaintiff met with Ms. Eggers and Carrie Hoffman on May 22, 2015. Ms. Eggers shocked plaintiff by suspending her for 2-days without pay for supposedly “combative” behavior during the feedback session with Ms. Greenstein. Plaintiff objected and denied that her behavior was anything other than respectful. Ms. Hoffman stated that “an investigation” had taken place, and it was determined that plaintiff’s “tone” was inappropriate. Plaintiff was never interviewed, nor was she aware of the so-called investigation. This was the first discipline plaintiff had ever received while working for KSHB-TV.

24. In September 2015, plaintiff was contacted by Corporate Human Resources via telephone to inform her that since plaintiff had filed her Charge of Discrimination that they were no longer able to assist in the investigation of plaintiff’s complaints of race discrimination. The female from Human Resources stated, “I want to help you figure out what is best for your future.” There was a very heavy emphasis placed on the “cost of an attorney” to defend the

Charges of Discrimination. Plaintiff read between the lines that there was a threatening undertone in that ominous reference to her “future.”

25. Plaintiff has been treated differently and her race is a contributing factor. Plaintiff is entitled to all actual damages for all harms and losses suffered in the form of lost compensation and benefits, for all non-economic damages such as career disruption, pain and suffering, mental anguish, anxiety and emotional distress. Defendant’s actions are in reckless disregard of plaintiff’s rights under the MHRA.

26. Plaintiff is entitled to all actual damages and to punitive damages in such amounts as will be proven at trial and found to be reasonable by a jury.

WHEREFORE, plaintiff prays for judgment after jury trial, awarding plaintiff all actual damages and losses shown in evidence and determined by the jury to be fair and reasonable, for prejudgment interest, for punitive damages, for attorneys’ fees, costs and expenses, and for such other relief as the Court deems proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by a jury on all issues raised herein.

Respectfully submitted,

THE POPHAM LAW FIRM

By: /s/ Dennis E. Egan  
DENNIS E. EGAN - MO 27449  
712 Broadway, Suite 100  
Kansas City, MO 64105  
Telephone: (816) 221-2288  
Telecopier: (816) 221-3999  
degan@pophamlaw.com  
ATTORNEYS FOR PLAINTIFFS



# State of Missouri

Jason Kander, Secretary of State

Corporations Division

PO Box 778 / 600 W. Main St., Rm. 322

Jefferson City, MO 65102

**X01030338**  
**Date Filed: 12/11/2014**  
**Expiration Date: 1/25/2020**  
**Jason Kander**  
**Missouri Secretary of State**

## Registration of Fictitious Name

(Submit with filing fee of \$7.00)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

**Please check one box:**

☐ New Registration ☒ Renewal X01030338 ☐ Amendment                      ☐ Correction                       
Charter number Charter number Charter number

**The undersigned is doing business under the following name and at the following address:**

Business name to be registered: KSHB-TV

Business Address: 312 Walnut Street Ste 2800  
(PO Box may only be used in addition to a physical street address)

City, State and Zip Code: Cincinnati, OH 45202

### Owner Information:

If a business entity is an owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed. Please attach a separate page for more than three owners. The parties having an interest in the business, and the percentage they own are:

Name of Owners, Individual or Business Entity	Charter # Required If Business Entity	Street and Number	City and State	Zip Code	If Listed, Percentage of Ownership Must Equal 100%
SCRIPPS MEDIA, INC.	F01021994	312 Walnut Street Suite 2800	Cincinnati, OH	45202	

### All owners must affirm by signing below

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060 RSMo)

SCRIPPS MEDIA, INC. - William Appleton	SCRIPPS MEDIA, INC. - WILLIAM APPLETON	12/11/2014
Owner's Signature or Authorized Signature of Business Entity	Printed Name	Date

Name and address to return filed document:

Name: William Appleton

Address: Email: julie.cornwell@scripps.com

City, State, and Zip Code:



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS  
COMMISSION ON HUMAN RIGHTS  
**CHARGE OF DISCRIMINATION**

Enter Charge Number

☐ FEPA  
☐ EEOC

E-06/15-45311  
 28E 2015 01132

This form is affected by the Privacy Act of 1974; see Privacy Act Statement before completing this form.

Missouri Commission on Human Rights and EEOC		
Name (Indicate Mr., Ms., or Mrs.) Lisa Benson Cooper	Date of Birth 2-25-1976	Home Telephone No. (Include Area Code) 314-920-3332
Street Address 6026 Euclid Ave	City, State and Zip Code Kansas City, MO 64130	County Jackson

**Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).**

Name KSHB TV	No. of Employees/Members 50+	Telephone No. (Include Area Code) 816-753-4141
Street Address 4720 Oak Street	City, State and Zip Code Kansas City, MO 64112	
Name	No. of Employees/Members	Telephone No. (Include Area Code)
Street Address	City, State and Zip Code	

Cause of Discrimination based on (Check appropriate box(es))

☒ Race  
☐ National Origin  
☐ Disability  
☐ Color  
☐ Religion  
☒ Retaliation  
☐ Sex  
☐ Age  
☒ Other (Specify) Hostile Work Environment

Date Discrimination took Place (Month, Day, Year)

2005 - Present

☒ Continuing Action

The Particulars Are (If additional space is needed, attach extra sheet(s)):

Please see attached

**FILED**

JUN 01 2015

MO Commission on Human Rights  
 Jefferson City Office

☒ I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary to meet State and Local Requirements)

*Cindy Wagner*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

*Lisa Benson Cooper* 5/20/15  
 Charging Party (Signature) Date

X  
 Signature of Complainant

5/20/15

Subscribed and sworn to before me on this day of May, 2015

**CINDY WAGNER**  
 Notary Public, My Comm. Exp. 12/31/16  
 State of Missouri  
 Commissioned for Clay County  
 My Commission Expires: February 28, 2016  
 Commission Number: 12473788 (4-99) AI

I, Lisa Benson, am an African American woman, I have been repeatedly passed over for several promotions and job openings from 2005 to present, because of a hostile environment based on race and gender discrimination. Throughout the years I have worked to improve my position and career with KSHB, and have been pretextually and purposely passed over for promotion for the positions for which I applied. Instead, I witnessed a pattern and practice of almost all promotions being awarded to white employees, many of whom had less experience at the time of hiring.

On March 8, 2004 I began working with KSHB-TV as a general assignment reporter. In September of 2005 a new show, Kansas City Live, was launched and the host position was never made available to employees. The spot was given to Meredith Hoeness, a white female with less professional experience than me. A few years later KC Live was cancelled and Meredith was released.

In January of 2008, news director Rick Iler started a new morning show that I applied for, but was not hired. Mike Marusz and Amy Hawler, who are both white, were hired instead. Mike was hired despite having less professional experience than me. Additionally, Rick Iler coerced Amy, who never applied for the job, to take the position. A year later, Rick Iler resigned amid accusations of a sexual relationship with a producer and inappropriate connections with other female employees. Rick Iler was a white male, and the woman of the alleged affair was also white. All of the female producers and reporters he hired during his time at KSHB were white. At the end of 2008 I received "meets requirements" in my annual performance review.

Peggy Phillip became news director in 2009 and informed me that I was one of the top three finalists for a morning anchor position that opened in January of 2010. I was denied the position and Peggy told me they went with another anchor because, "We needed some fresh meat in the newsroom". They hired Najahe Sherman, a bi-racial Mrs. America pageant finalist and former Kansas City Chiefs cheerleader who had less professional experience than me. I again received a "meets requirements" on my annual performance review for 2010.

Starting in June of 2011 I took additional steps to better situate myself for consideration the next time an anchor position became available. I submitted an anchoring DVD of myself to Peggy Philip for feedback and consideration. The next month I met with the station's talent development coach for critique. The coach offered minor improvements, but fully complimented my work. After being overlooked to fill in as a weekend anchor in September of 2011, Peggy told me Beth Vaughn was an easier replacement since she already worked the weekend shift. After that, I switched shifts with Beth permanently in order to better position myself to grow as an anchor. I began working four 10-hour shifts including weekends. In addition to taking steps to further my career, in October of 2011 I received a National Academy of Arts and Sciences Emmy at the award gala in St. Louis, Missouri. On March 12, 2012, I received a fully "meets requirements" on my annual performance review for 2011.

In June of 2012, KSHB restarted Kansas City Live hiring a white female and white male to host the show. The next month Peggy Philip was fired, and Brian Bracco was hired as General Manager. I received a "fully meets expectations" in my

**FILED**  
JUN 01 2015  
Missouri Commission on Human Rights  
Jefferson City Office



performance review for 2012. On February 20, 2013, I gave birth to my son, Chase Edison Cooper, and took 12 weeks of maternity leave. On March 6, 2013 Carrie Hofmann was hired as news director replacing Peggy Philips. Shortly after, Najahe Sherman's contract was not renewed and I expressed interest in the open position while still on maternity leave. In May 2013, I returned from maternity leave and found out the position was given to Lindsay Shively, a younger, white female reporter with less experience than me.

Carrie Hofmann offered me a 2-year reporter contract in August 2013 and I continued to work the same hours since I switched with Beth Vaughn (four 10-hour days). During this time, I was repeatedly sent out to the "urban core" for all of my assignments because that is what I was "used" to. I later complained about only being sent to urban areas and reporting on predominately black crime. After my complaints, I was asked to go to a KKK member's house alone. Further evidence that my race was constantly used in deciding where or what I was reporting.

In 2014, I applied to be a Leadership Champion at the station to help the newsroom's less experienced journalists and improve my career. However, that position was given to a white man and woman instead. Five months later, one station champion quit working for KSHB and was replaced by a white male colleague. In September of 2014, Assistant News Director, Matt Brown, started monthly feedback meetings resulting in the promotion of Lindsay Shively and the demotion of Jiao Jiao Shen to a weekend morning anchor. The next month, Jiao Jiao Shen quits as the weekend morning anchor and I applied to the open position in December of 2014.

In January of 2015, I requested feedback for my anchoring and to attend an Investigative Reporter and Editors Conference in Philadelphia. Continuing to take steps in improving my career with KSHB, I applied to be a Consumer Reporter, Investigative Reporter, and Weekend Morning Anchor. In addition, I applied for an anchor/reporter position with KMGH (an affiliate in Denver). I received a "fully meets requirements" performance review for 2014. In March, Brian Bracco rehired the former anchor Mike Marusz (who had resigned in 2009) to be the male evening anchor for 5, 6, and 10 pm newscasts.

In April of 2015, a white female with less experience than me was hired as a consumer reporter starting in May of 2015. Additionally, KSHB expanded the weekend newscasts affecting my schedule. In discussing my schedule and continued desire to grow with KSHB, Carrie Hofmann preferred that I switch to a 5-day workweek including weekend mornings. I expressed a proposal of working a 5-day workweek only on weekdays rather than continuing on the weekend. In a later meeting, in front of the executive producer and HR manager, Hofmann informed me that I am an inconsistent, unbalanced reporter who is not good enough to work the Monday through Friday dayside shift. This was the first time in my KSHB career that I had been informed of any performance issues. I was deeply offended by the derogatory, harassing remarks as well as the HR manager's defense of the unprovoked harassment.

May 19, 2015, I met with Melissa Greenstein in the newsroom for a scheduled feedback session. In the meeting, Melissa questioned my decision to use

**FILED**

JUN 01 2015

MO Commission on Human Rights  
Jefferson City Office



file video for a flooding story. I explained my reasoning and reiterated that if she ever had a specific video request to just let me know, and I would honor that request in the field. Melissa became extremely irritated at this point. I again tried to explain my reasoning and was told, "You are not listening." She then gathered her things and abruptly left our meeting. I respected her decision and told her "goodbye." Later that evening, I received an email from Melissa stating that I was not receptive and combative during the feedback session. May 21, 2015, I received a call from Jessica Eggers, KSHB-TV Human Resources Director. She wanted to set up a meeting with me and Carrie Hoffman. The meeting was scheduled for May 26, 2015.

May 23, 2015, I called the Ethicpoint Line to report my ongoing situation of hostile and differential treatment. I feared more retaliatory actions would take place during the upcoming meeting. My fears came true

I met with Jessica Eggers and Carrie Hoffman on May 26, 2015. Jessica informed me that I was being suspended for 2-days without pay for my feedback session that I had with Melissa Greenstein. She said my behavior was "disruptive" and "aggressive," which I vehemently deny. I told her that I was very surprised that my feedback session was described as such. I reiterated that Melissa and I did disagree about the use of file video, but the exchange was not disrespectful. I asked Jessica what I had said that was disruptive and aggressive. Her response was, "It wasn't what you said. It was more your tone." Carrie stated that an investigation was conducted, and it was determined that my tone was inappropriate. I was never interviewed, nor aware of this investigation. I had never received any discipline prior to this suspension. KSHB did not follow their policies and procedures of progressive discipline. When I left the meeting, I called the Ethicpoint line again to update my ongoing file. This suspension was blatant retaliation.

The remarks and actions have led me to take issue with corporate human resources. I have worked hard to improve my position with KSHB and have continuously seen less qualified, white applicants take the positions for which I applied.

The lack of growth in my career stems from ongoing racial and gender discrimination, and retaliation for my protected objections to the discrimination. The sudden declaration of performance issues are being used as pretext for discrimination.

**FILED**

JUN 01 2015

MO Commission on Human Rights  
Jefferson City Office



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS  
COMMISSION ON HUMAN RIGHTS  
**CHARGE OF DISCRIMINATION**

Enter Charge Number

☐ FEPA☐ EEOCE-09/15-45795  
28E201501707

*This form is affected by the Privacy Act of 1974; see Privacy Act Statement before completing this form.*

**Missouri Commission on Human Rights and EEOC**

Name (Indicate Mr., Ms., or Mrs.) Lisa Benson	Date of Birth 2-25-1976	Home Telephone No. (Include Area Code) 314-920-3332
Street Address 6026 Euclid Avenue	City, State and Zip Code Kansas City, MO 64130	County Jackson County

**Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).**

Name KSHB TV	No. of Employees/Members 50+	Telephone No. (Include Area Code) 816-753-4141
Street Address 4720 Oak Street	City, State and Zip Code Kansas City, MO 64112	
Name	No. of Employees/Members	Telephone No. (Include Area Code)
Street Address	City, State and Zip Code	

Cause of Discrimination based on (Check appropriate box(es))

- ☐ Race      ☐ Color      ☐ Sex  
☐ National Origin      ☐ Religion      ☐ Age  
☐ Disability      ☒ Retaliation      ☐ Other (Specify) Hostile Work Environment

Date Discrimination took Place  
(Month, Day, Year)

2005 - Present

☒ Continuing Action

The Particulars Are (If additional space is needed, attach extra sheet(s)):

This charge is incorporated by reference with my original charge of discrimination (E-06/15-45311; 28E-2015-01132C) filed in June 2015.

I was contacted by Corporate HR via telephone to inform me that since I had filed a Charge of Discrimination that they were no longer able to assist me with my complaints of Race Discrimination. The female told me that she wanted to "help me figure out what was best for my future." There was also a heavy emphasis placed on the "cost of an attorney" to defend my Charge of Discrimination.

I believe this is retaliation for my original charge that was filed. I should be able to go to work and feel comfortable and should not be told they can no longer help.

Further Documentation is attached.

I seek all remedies allowed by law.

**FILED**

SEP 21 2015

MO Commission on Human Rights  
Jefferson City Office

☒ I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

*Lisa Benson*  
Charging Party (Signature) \_\_\_\_\_ Date \_\_\_\_\_

CINDY WAGNER  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for City County  
My Commission Expires: February 09, 2016  
Commission Number: 12473798

NOTARY - (When necessary to meet State and Local Requirements)

*Cindy Wagner* *Cindy Wagner*  
I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

*Lisa Benson*  
Signature of Complainant \_\_\_\_\_

Subscribed and sworn to before me this date (Day, month and Year)

MCHR-27 (4-99) AJ



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS  
**MISSOURI COMMISSION ON HUMAN RIGHTS**



JEREMIAH W. (JAY) NIXON  
GOVERNOR

RYAN MCKENNA  
DEPARTMENT DIRECTOR

SARA NELL LAMPE  
COMMISSION CHAIRPERSON

ALISA WARREN, PH.D.  
EXECUTIVE DIRECTOR

September 20, 2016

Lisa Benson Cooper  
6026 Euclid Ave.  
Kansas City, MO 64130

RE: Cooper vs. KSHB TV  
E-6/15-45311 28E-2015-01132

E-6/15-45311  
Administrative Use/Records

The Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue under the Missouri Human Rights Act because you have requested a notice of your right to sue.

This letter indicates your right to bring a civil action within 90 days of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period for any federal claims. This notice of right to sue is being issued as required by Section 213.111.1, RSMo, because it has been requested in writing 180 days after filing of the complaint. This complaint was being initially processed by the EEOC and MCHR has not been notified of their determination. **Please note that administrative processing of this complaint, including determinations of jurisdiction, has not been completed.**

(continued on next page)



3315 W. TRUMAN BLVD.  
P.O. Box 1129  
JEFFERSON CITY, MO 65102-1129  
PHONE: 573-751-3325  
FAX: 573-751-2905



111 N. 7TH STREET, SUITE 903  
ST. LOUIS, MO 63101-2100  
PHONE: 314-340-7590  
FAX: 314-340-7238



P.O. Box 1300  
OZARK, MO 65721-1300  
FAX: 417-485-6024



1410 GENESSEE, SUITE 260  
KANSAS CITY, MO 64102  
FAX: 816-889-3582



106 ARTHUR STREET  
SUITE D  
SIKESTON, MO 63801-5454  
FAX: 573-472-5321

*Missouri Commission on Human Rights is an equal opportunity employer/program. Auxiliary aides and services are available upon request to individuals with disabilities.*

TDD/TTY: 1-800-735-2966 (TDD) Relay Missouri: 711  
www.labor.mo.gov/mohumanrights E-Mail: mchr@labor.mo.gov

RE: Cooper vs. KSHB TV  
E-6/15-45311 28E-2015-01132

Respectfully,



Alisa Warren, Ph.D.  
Executive Director

KSHB TV  
4720 Oak St.  
Kansas City, MO 64112

M. Scott McIntyre  
312 Walnut, Suite 3200  
Cincinnati, OH 45202-4074

Dennis Egan  
712 Broadway, Suite 100  
Kansas City, MO 64105'  
*Via email*

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JEFFERSON CITY, MO 65102-1129  
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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS  
**MISSOURI COMMISSION ON HUMAN RIGHTS**



JEREMIAH W. (JAY) NIXON  
GOVERNOR

RYAN MCKENNA  
DEPARTMENT DIRECTOR

SARA NELL LAMPE  
COMMISSION CHAIRPERSON

ALISA WARREN, Ph.D.  
EXECUTIVE DIRECTOR

December 13, 2016

Lisa Benson  
6026 Euclid Ave.  
Kansas City, MO 64130

RE: Benson vs. KSHB TV  
E-9/15-45795 28E-2015-01707

The Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue under the Missouri Human Rights Act because you have requested a notice of your right to sue.

This letter indicates your right to bring a civil action within 90 days of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period for any federal claims. This notice of right to sue is being issued as required by Section 213.111.1, RSMo, because it has been requested in writing 180 days after filing of the complaint. This complaint was being initially processed by the EEOC and MCHR has not been notified of their determination. **Please note that administrative processing of this complaint, including determinations of jurisdiction, has not been completed.**

(continued on next page)



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P.O. Box 1300  
OZARK, MO 65721-1300  
FAX: 417-485-6024



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KANSAS CITY, MO 64102  
FAX: 816-889-3582



106 ARTHUR STREET  
SUITE D  
SIKESTON, MO 63801-5454  
FAX: 573-472-5321

*Missouri Commission on Human Rights is an equal opportunity employer/program. Auxiliary aides and services are available upon request to individuals with disabilities.*

TDD/TTY: 1-800-735-2966 (TDD) Relay Missouri: 711  
[www.labor.mo.gov/mohumanrights](http://www.labor.mo.gov/mohumanrights) E-Mail: [mchr@labor.mo.gov](mailto:mchr@labor.mo.gov)

RE: Benson vs. KSHB TV  
E-9/15-45795 28E-2015-01707

Respectfully,



Alisa Warren, Ph.D.  
Executive Director

KSHB TV  
4720 Oak Street  
Kansas City, MO 64112

M. Scott McIntyre  
213 Walnut Street, Suite 3200  
Cincinnati, OH 45202

Aly Pack  
712 Broadway, Suite 100  
Kansas City, MO 64105  
*Via email*

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P.O. BOX 1129  
JEFFERSON CITY, MO 65102-1129  
PHONE: 573-751-3325  
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TDD/TTY: 1-800-735-2966 (TDD) Relay Missouri: 711  
www.labor.mo.gov/mohumanrights E-Mail: mchr@labor.mo.gov

# EXHIBIT A-3

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**LISA BENSON COOPER,**  
**6026 Euclid Avenue**  
**Kansas City, MO 64130**

**Plaintiff,**

**v.**

**KSHB-TV,**  
**4720 Oak Street**  
**Kansas City, MO 64112**

**SERVE: Under Rule 54.13(b)(3)**  
**President and General Manager**  
**Brian Bracco**  
**4720 Oak Street**  
**Kansas City, MO 64112**

**and**

**SCRIPPS MEDIA, INC.**  
**312 Walnut Street, Suite 2800**  
**Cincinnati, OH 45202**

**SERVE:**  
**CSC-Lawyers Incorporating**  
**Service Company**  
**221 Bolivar Street**  
**Jefferson City, MO 65101**

**Defendants.**

**Case No.:**

**DEMAND FOR JURY TRIAL**

**AFFIDAVIT**

STATE OF MISSOURI     )  
  ) ss:  
COUNTY OF JACKSON    )

Dennis E. Egan, of lawful age, being first duly sworn upon his oath, states as follows:

1.     That he is presently employed as an attorney with The Popham Law Firm, 712 Broadway, Suite 100, Kansas City, MO 64105.



2. That the following defendants will be served **Plaintiff's Petition for Damages**  
via Certified Mail Return Receipt Requested by the Clerk of the District Court:

**KSHB-TV,**

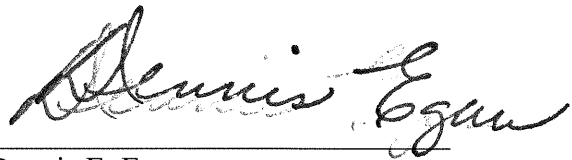
**SERVE: Under Rule 54.13(b)(3)**  
**President and General Manager**  
**Brian Bracco**  
**4720 Oak Street**  
**Kansas City, MO 64112**

**and**

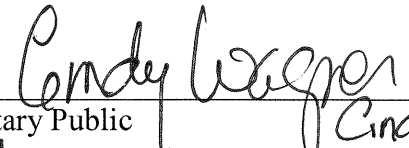

**SCRIPPS MEDIA, INC.**

**SERVE:**  
**CSC-Lawyers Incorporating**  
**Service Company**  
**221 Bolivar Street**  
**Jefferson City, MO 65101**

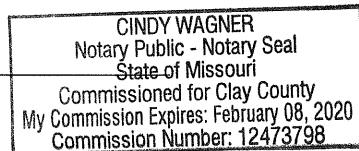
FURTHER AFFIANT SAITH NOT.

  
Dennis E. Egan

Subscribed and sworn to before me this 13<sup>th</sup> day of December, 2016.

  
Notary Public 

My Commission Expires: \_\_\_\_\_



# EXHIBIT A-4



**IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI**

Judge or Division: JOEL P FAHNESTOCK	<b>Case Number: 1616-CV29724</b>	(Date File Stamp)
Plaintiff/Petitioner: LISA BENSON COOPER	Plaintiff's/Petitioner's Attorney/Address: DENNIS EDWARD EGAN THE POPHAM LAW FIRM, P.C. 712 BROADWAY SUITE 100 KANSAS CITY, MO 64105	
Defendant/Respondent: KSHB-TV	Court Address: 415 E 12th KANSAS CITY, MO 64106	
Nature of Suit: CC Employmnt Discrmntn 213.111		

**Summons for Service by Registered or Certified Mail**

**The State of Missouri to: KSHB-TV**

**BRIAN BRACCO - GENERAL MANAGER  
4720 OAK STREET  
KANSAS CITY, MO 64112**

**COURT SEAL OF**



**JACKSON COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

20-DEC-2016  
Date Issued

Clerk

Further Information:

**Certificate of Mailing**

I certify that on December 20, 2016, I mailed a copy of this summons and a copy of the petition to Defendant/Respondent KSHB-TV by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

**December 20, 2016**

Date

Clerk

USPS TRACKING NUMBER 9214 8901 0661 5400 0100 0580 37

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

# EXHIBIT A-5



**IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI**

Judge or Division: JOEL P FAHNESTOCK	<b>Case Number: 1616-CV29724</b>	(Date File Stamp)
Plaintiff/Petitioner: LISA BENSON COOPER	Plaintiff's/Petitioner's Attorney/Address: DENNIS EDWARD EGAN THE POPHAM LAW FIRM, P.C. 712 BROADWAY SUITE 100 KANSAS CITY, MO 64105	
Defendant/Respondent: KSHB-TV	Court Address: 415 E 12th KANSAS CITY, MO 64106	
Nature of Suit: CC Employmnt Discrmntn 213.111		

**Summons for Service by Registered or Certified Mail**

**The State of Missouri to: SCRIPPS MEDIA**

**R.A.- CSC LAWYERS INC. SRV. CO  
221 BOLIVAR ST.  
JEFFERSON CITY, MO 65101**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

20-DEC-2016  
Date Issued

Clerk

Further Information:

**Certificate of Mailing**

I certify that on December 20, 2016, I mailed a copy of this summons and a copy of the petition to Defendant/Respondent SCRIPPS MEDIA by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

December 20, 2016  
Date

Clerk

USPS TRACKING NUMBER 9214 8901 0661 5400 0100 0585 70

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

# EXHIBIT A-6



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**LISA BENSON COOPER,**

**PLAINTIFF(S),**

**CASE NO. 1616-CV29724  
DIVISION 9**

**VS.**

**KSHB-TV,**

**DEFENDANT(S).**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

---

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **JOEL P FAHNESTOCK** on **03-APR-2017** in **DIVISION 9** at **09:00 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

### **MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

### **POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ JOEL P FAHNESTOCK**  
**JOEL P FAHNESTOCK, Circuit Judge**

### **Certificate of Service**

This is to certify that a copy of the foregoing was mailed postage pre-paid or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

#### **Attorney for Plaintiff(s):**

DENNIS EDWARD EGAN, THE POPHAM LAW FIRM, P.C., 712 BROADWAY, SUITE 100, KANSAS CITY, MO 64105

#### **Defendant(s):**

KSHB-TV  
SCRIPPS MEDIA

Dated: 20-DEC-2016

**Jeffrey A. Eisenbeis**  
Court Administrator